

EXHIBIT B

Subpoena for Records - Savino v. Souza

Aseem Mehta <aseem.mehta@ylsclinics.org>

Fri 6/19/2020 6:16 PM

To: ashelton@geogroup.com <ashelton@geogroup.com>

Cc: Michael Wishnie <michael.wishnie@ylsclinics.org>

📎 3 attachments (610 KB)

218 Ds supplemental brief on revocation of bond.pdf; 199-2 Bail Violations Spreadsheet.pdf; 2020.06.16 Subpoena to BI - Final for Service.pdf;

Anthony,

Thanks for taking the time to speak.

Per our conversation, we request receipt of the below listed information from your client by June 24 at 12pm. We are willing to extend the deadline for production of the remaining information in the subpoena (attached for your reference) -- the outstanding records from item 1 and all records in items 2 and 3 -- by one week, to July 1.

The information to be produced by June 24th is:

- GPS coordinate information, including all registered "hits" of GPS "violations" for the 8 individuals listed in items 1(a)-(g), and (i). The names of these individuals are:
 - a. Del Angel Moran, Gabino (A208-299-948), DOB: 9/27/1986
 - b. Mahadeo, Kavon (A059-104-840), DOB: 11/1/1985
 - c. Desmond, Joseph (A088-189-852), DOB: 8/2/1987
 - d. Vargas, Cesar (A045-456-709), DOB: 8/20/1980
 - e. Ferriera, Palmar (A029-514-865), DOB: 5/13/1962
 - f. Valentim, Lucas (A216-305-198), DOB: 9/11/1984
 - g. Ramirez-Maldonado, Ranferi (A205-241-005), DOB: 2/24/1981
 - i. Gutierrez-Deleon, Carlos (A216-305-137), DOB: 12/7/1978
- The date range for the information to be collected is April 3, 2020 to the date that the data is collected.
- The attached filings (labeled 199-2 and 218) indicate the dates that the government has alleged that these individuals registered GPS "violations" through June 8. The information produced should include all of the dates referenced by the government for each individual and be current, up to the date that the information is collected.

Thank you for your prompt attention to this matter. Please let us know if you have any questions.

Regards,
Aseem

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he/him/his

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